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JOEL KOHN
Interim Executive Director

February 27, 1992

Mr. Frazer Lockhart
U. S. Department of Energy
Rocky Flats Office
P O. Box 928
Golden, Colorado 80402-0928

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RE. IAG Technical Memoranda (TM)

Dear Mr. Lockhart,

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division), and the U. S. Environmental Protection Agency (EPA) are forwarding this letter to DOE in an effort to clarify the role of technical memoranda in fulfillment of IAG requirements. This clarification is aimed particularly at RFI/RI workplan addenda.

Specific to RFI/RI workplans, technical memoranda are mentioned in the final paragraph of section VI.B of the IAG Statement of Work. That paragraph states that technical memoranda shall document the need for additional data and data quality objectives (DQOs) whenever such requirements are identified. Therefore, the CDH and EPA position on this matter is as follows. Documents submitted that do not, as their primary purpose, state the need for additional data or DQOs shall not be entitled "technical memoranda." Only those documents that meet the above requirements and constitute an amendment of, or an addition to, an approved sampling plan will be accepted as "technical memoranda."

Following this approach for documents submitted to date, only TM 2 and 5 for OU 1 and TM 2 for OU 2 would have been correctly titled. The others would have been more appropriately handled as different document types:

- * TM 1 for OU 1 should have been a response to comments.
- * TM 3 and 4 for OU 1 should have been SOPs or workplan specific SOPAs.
- * TM 1 for OU 2 represents an overhaul of the alluvial workplan undertaken as a response to comments and should

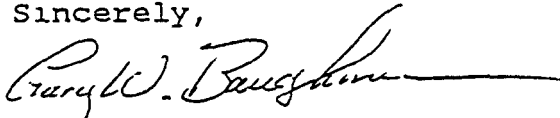
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have replaced, not added to, the previous version of the workplan.

RFI/RI workplans are designed to be used in the field. DOE should make every effort to avoid burdening them with a lot of additions which do not affect implementation.

If you have any questions regarding these matters, please call Joe Schieffelin (CDH) at 331-4421 or Bill Fraser (EPA) at 294-1081.

Sincerely,



Gary W. Baughman
Unit Leader, Hazardous Waste Facilities
Hazardous Materials and Waste Management Division



Martin Hestmark
Manager, Rocky Flats Project
U.S. Environmental Protection Agency

cc: Daniel S. Miller, AGO
Barbara Barry, RFP
Paul Bunge, EG&G